

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)
)
 v.)
)
 JAMES MEEK.)

Case No. 1:23CR65-CMH

CONSENT MOTION TO CONTINUE MOTIONS HEARING AND TRIAL DATE

James Meek, through counsel, and with consent of the government, respectfully moves the Court to continue the motions hearing and the trial date in this matter. In support of this motion, Mr. Meek states as follows:

1. Mr. Meek was arraigned on April 14, 2023. On that date, the Court set the pretrial motions deadline for May 4, 2023, with a motions hearing date of May 19, 2023. The Court set a trial date of June 20, 2023.
2. The parties have conferred regarding discovery, and the government is working to identify and produce additional items of discovery requested by the defense.
3. Undersigned counsel had a pre-existing international trip scheduled for April 28 through May 9, 2023. Undersigned counsel intended to file pretrial motions prior to leaving for the trip, giving the government two weeks to respond to the motions and leaving sufficient time to file reply briefs prior to the May 19 hearing. However, given that there are still discovery requests outstanding, counsel is not in a position to file pretrial motions early, as previously intended.¹

¹ If the motions are filed on the deadline of May 4, and the government has two weeks to file responses, this will leave only one day to file reply briefs prior to the May 19, 2023 hearing date.

4. In light of these circumstances, and to ensure that the government has adequate time to respond to motions and that the defense has time to file reply briefs sufficiently in advance of the motions hearing, Mr. Meek respectfully asks this Court to continue the motions hearing to a later date. The parties have conferred, and both the government and defense would be available for a motions hearing on May 26, 2023 or the following week, on June 2, 2023.
5. The parties also request a corresponding continuance of the trial date to allow sufficient time for trial preparation after the motions hearing. Both the government and the defense are available the week of June 26 and July 5, 2023.
6. Undersigned counsel has discussed this request and the exclusion of Speedy Trial time, and Mr. Meek consents to exclude the additional time, which is necessary to completely address pretrial motions and provide sufficient time for both parties to prepare for trial. Additionally, we would respectfully submit that all of the findings previously made by the Court in its April 21, 2023 order apply to this request as well. ECF 49.

WHEREFORE, for all of the foregoing reasons, the parties ask this Court to continue the motions hearing to May 26 or June 2, 2023, and to continue the trial date to June 26 or July 5, 2023.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document VIA ECF which provides a copy to the AUSA of record.

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